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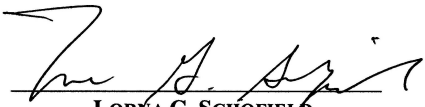
July 8, 2025

VIA CM/ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application **DENIED** without prejudice to renew. A three-part inquiry determines whether to seal a document. *See Olson v. Major League Baseball*, 29 F.4th 59, 87-88 (2d Cir. 2022); *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Confidential designations are not dispositive of whether the public's right of access to judicial documents overcomes competing considerations. By **July 18, 2025**, Nutramax shall file a letter stating whether it seeks to have the material that is the subject of the motion sealed or redacted and stating the legal basis for the request; or whether it has no objection to the public filing of such material. The Clerk of Court is respectfully directed to maintain Dkt. 299 under seal.

Dated: July 11, 2025
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Health and Happiness (H&H) US LLC v. Nutramax Laboratories, Inc., et. al.* (Case No.: 1:23-cv-10849-LGS): Letter Motion to Seal/Redact Portions of Opposition to Nutramax's Pre-Motion Letter Regarding Summary Judgment and Related Exhibits (Dkt. 294)

Dear Judge Schofield:

Pursuant to Rule I.D.3 of this Court's Individual Rules and Procedures for Civil Cases (the "Procedures"), Section 6 of the Southern District of New York's Electronic Case Filing Rules & Instructions (the "Rules"), and Section VI of the Joint Protective Order (Dkt. 80; the "PO"), Health and Happiness (H&H) US LLC ("Zesty Paws") respectfully requests that the Court allow to be filed and maintained under seal those portions of Zesty Paws' Opposition to Nutramax's Pre-Motion Letter Regarding Summary Judgment (the "Opposition") that quote, summarize, or disclose information from documents or testimony produced by Nutramax that Nutramax had previously designated under the PO as either Highly Confidential Information – Outside Attorneys' Eyes Only or Highly Confidential Information – Attorneys' Eyes Only. Similarly, Zesty Paws respectfully requests that the Court allow to be filed and maintained under seal the exhibits filed in support of the Opposition, all of which Nutramax has previously designated as Highly Confidential Information – Outside Attorneys' Eyes Only.

In accordance with the Procedures, Rules, and PO, Zesty Paws is submitting an unredacted version of the Opposition with the proposed redactions highlighted, with access limited to the Court, Parties, and counsel identified in Appendix A.

Respectfully submitted,

/s/ Steven N. Feldman
Steven N. Feldman
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

LATHAM & WATKINS LLP

APPENDIX A

Parties:

Health and Happiness (H&H) US LLC
Nutramax Laboratories, Inc.
Nutramax Laboratories Veterinary Sciences, Inc.
Health and Happiness U.S. International Incorporated

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